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7 ***Appearances of Counsel Continued on Next Page***

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10 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

11 U.S. SECURITIES AND EXCHANGE
12 COMMISSION,

13 v.
14 Plaintiff,

15 CROWD MACHINE, INC., METAVINE, INC.,
and CRAIG DEREL SPROULE,

16 Defendants,
17

Case No. 4:22-CV-00076-HSG

Hon. Haywood S. Gilliam, Jr.

**STIPULATION AND JOINT
STATEMENT TO REQUEST
MODIFICATION OF SCHEDULING
ORDER (ECF NO. 48) AND EXTENSION
OF DEADLINES (WITH ORDER)**

18 and
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20 METAVINE PTY. LTD.,
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22 Relief Defendant.
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CROWD MACHINE, INC. and METAVINE, INC.,
8 and Relief Defendant METAVINE PTY. LTD.

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1 Plaintiff United States Securities and Exchange Commission (“SEC”), Defendants Crowd
 2 Machine, Inc. and Metavine, Inc., and Relief Defendant Metavine Pty, Ltd. (collectively “Crowd
 3 Machine entities”), hereby jointly submit the following Stipulation and Joint Statement pursuant
 4 to Local Civil Rules 6-1, 6-2, and 7-12, Federal Rule of Civil Procedure 16(b)(4), and paragraph
 5 15 of this Court’s Standing Order, seeking modification of the Court’s September 5, 2023, order
 6 (ECF No. 48) to extend by 7 days the SEC’s deadline to file its reply in support of its motion for
 7 monetary relief, subject to the Court’s approval:

8 1. On March 23, 2022, the Court issued a Scheduling Order, setting this matter for a
 9 May 11, 2023, hearing on the amount of monetary relief owed. The Order also set forth interim
 10 deadlines for the completion of fact discovery, the exchange of expert reports and discovery, and
 11 a briefing schedule for the SEC’s forthcoming motion for monetary relief.

12 2. On September 6, 2022, the Court granted the parties’ joint stipulation to extend
 13 the deadlines set forth in the Scheduling Order by approximately 90 days (ECF No. 31).

14 3. On December 19, 2022, the Court granted the parties’ joint stipulation to extend
 15 the deadlines set forth in the Scheduling Order by approximately 45 days. (ECF No. 36).

16 4. On July 31, 2023, the Court granted the parties’ joint stipulation to extend the
 17 deadlines set forth in the Scheduling Order by 14 days (ECF No. 39).

18 5. On September 5, 2023, the Court Granted the parties’ joint stipulation to extend
 19 the deadlines set forth in the Scheduling Order by 14 days (ECF No. 48).

20 6. As set forth in the following Joint Statement of Good Cause, the parties agree
 21 there is good cause to extend by 7 days the SEC’s deadline to file its reply to in support of its
 22 motion for monetary relief. The parties propose that the hearing on the SEC’s motion for
 23 monetary relief be held as scheduled on November 16, 2023, at 2:00 p.m.

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Joint Statement of Good Cause

7. Discovery in this matter has now concluded.

3 8. The SEC filed its motion for monetary relief on August 18, 2023, and the Crowd
4 Machine entities filed their opposition to the SEC's motion on September 29, 2023.

5 9. The sole remaining deadline in this matter relates to the SEC's reply in support of
6 its motion for monetary relief, which is currently due on October 13, 2023. A hearing on the
7 SEC's motion for monetary relief is scheduled for November 16, 2023.

8 10. Before filing its reply in support of its motion for monetary relief, counsel for the
9 SEC must submit its proposed filing for internal review and obtain supervisory approval.

11. Undersigned counsel for the SEC has worked diligently to obtain approval to file
its reply in support of its motion for monetary relief, but the approval process remains ongoing
and will not be complete before the SEC's filing deadline.

13 12. The parties therefore agree, subject to the Court's approval, that the SEC's
14 deadline to file its reply in support of its motion for monetary relief be extended by 7 days until
15 October 20, 2023.

16 13. The parties propose that the hearing on the SEC's motion for monetary relief be
17 held as scheduled on November 16, 2023.

18 14. The parties agree that this Joint Statement is made in good faith in the interest of
19 judicial economy and is not for the purpose of delay.

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1 Based on the foregoing, IT IS STIPULATED AND AGREED, by and between the
 2 parties and their undersigned counsel, that good cause exists for the SEC's deadline to file its
 3 reply in support of its motion for monetary relief, as set forth in the Court's order of September
 4 5, 2023 (ECF No. 48), to be MODIFIED as follows:

Event	Current Date (ECF No. 48)	Proposed New Date
Deadline for SEC to file reply in support of motion for monetary relief	Oct. 13, 2023	Oct. 20, 2023
Hearing on SEC's motion for monetary relief	Nov. 16, 2023, at 2:00 p.m.	Nov. 16, 2023, at 2:00 p.m. (No Change)

10 Dated: October 12, 2023

By: /s/ Adam B. Gottlieb

ADAM B. GOTTLIEB
Attorney for Plaintiff
U.S. SECURITIES AND EXCHANGE
COMMISSION

11 Dated: October 12, 2023

By: /s/ Justin T. Goodwin

JUSTIN T. GOODWIN
Attorney for Defendants
CROWD MACHINE, INC.,
METAVINE, INC., and METAVINE PTY. LTD.

CIVIL LOCAL RULE 5-1 ATTESTATION

Pursuant to Northern District of California Local Rule 5-1, I hereby attest that all other signatories listed above, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Adam B. Gottlieb
Adam B. Gottlieb

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/13/2023



HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE